

Exhibit B

[\[First Lien Lender Defs.' 4.14.2023 edits\]](#)

Serta Confirmation & Adversary Proceeding
Schedule

Action Item	Deadline
Defendants to file any amended/new counterclaims on the implied covenant of good faith and fair dealing	April 7, 2023 (as already agreed to by the parties)
Parties to serve any limited additional written or document discovery; <u>parties to</u> identify intended deponents	By April 10 <u>11</u> , 2023
Parties to meet and confer on limited additional written or document discovery and depositions	April 11, 2023, 1pm EDT; <u>April 14, 2023, 12:30pm EDT</u>
<u>Parties to serve any limited additional written or document discovery</u>	<u>By April 21, 2023</u>
<u>Parties to meet and confer on existing discovery dispute issues</u>	<u>April 24, 2023 [time TBD]</u>
<u>Third-Party Defendants to move or answer</u>	<u>April 21, 2023</u>
<u>First Lien Lender Defendants to serve and responses and objections to Plaintiffs' second set of written discovery requests</u>	<u>April 28, 2023</u>
Parties to identify "may call" fact witnesses	April 12 <u>May 5</u> , 2023
<u>Serta to substantially complete limited additional written or document discovery, including supplementing or revising existing disclosures</u>	<u>May 12, 2023</u>
Defendants/Counterclaimants/Third-Party Lender Plaintiffs to provide <u>substantially complete</u> <u>limited additional written or document discovery, including supplementing or revising existing disclosures</u> FRCP 26(a)(1)(A)(iii) disclosures for any counterclaims—calculation of damages and supporting materials [Other Rule 26(a) disclosures already covered by interrogatory responses]	April 14 <u>May 12</u> , 2023
<u>Advisors to substantially complete limited additional written or document discovery, including supplementing or revising existing disclosures</u>	<u>May 12, 2023</u>
<u>First Lien Lender Defendants to substantially complete limited additional written or document discovery, including supplementing or revising existing disclosures</u>	<u>May 12, 2023</u>
Parties to identify the names and backgrounds of affirmative expert witnesses they intend to use at confirmation and high level topics they anticipate such expert witnesses to be covering	April 17 <u>May 12</u> , 2023
Parties substantially complete limited additional written or document discovery, including supplementing or revising existing disclosures	April 20, 2023

~~3719125.1~~3719127.2

Plaintiffs 4.12.23 Amended Serta Confirmation and AP Schedule 3719125v1 and FLL Defs
4.14.23 edits to Plaintiffs 4.12.23 Amended Serta Confirmation and AP Schedule 3719127v2
4/14/2023 10:22:23 AM

[First Lien Lender Defs.' 4.14.2023 edits]

Fact depositions begin (no earlier than)	April 21 <u>May 15</u> , 2023
Affirmative expert disclosures <u>Depositions of First Lien Lender Defendants' 30(b)(6) witnesses</u>	April 24 <u>May 15-25</u> , 2023
<u>Parties to meet and confer on Serta & Lender Plaintiffs' privilege log(s)</u>	<u>May 16, 2023</u>
<u>Defendants/Counterclaimants/Third-Party Plaintiffs to provide FRCP 26(a)(1)(A)(iii) disclosures for any counterclaims – calculation of damages and supporting materials [Other Rule 26(a) disclosures already covered by interrogatory responses]</u>	<u>May 25, 2023</u>
Rebuttal <u>Affirmative</u> expert disclosures	May 3 <u>June 1</u> , 2023
Confirmation objection deadline <u>Rebuttal expert disclosures</u>	May 4 <u>June 9</u> , 2023
Fact depositions to conclude (no later than)	May 5 <u>June 12</u> , 2023
Expert depositions to occur	May 5 <u>June 14</u> – May 9 <u>21</u> , 2023
Exchange proposed witness & exhibit lists	May 5 <u>June 23</u> , 2023
<u>Confirmation objection deadline</u>	<u>June 26, 2023</u>
Exchange proposed deposition designations	May 8 <u>June 28</u> , 2023
Exchange objections to proposed exhibit lists	May 9 <u>June 30</u> , 2023
Exchange deposition counter-designations	May 10 <u>June 30</u> , 2023
Parties to meet and confer on exhibits that can be admitted by stipulation	May 10 <u>July 5</u> , 2023
File briefs in support of confirmation, pre-trial briefs on good faith and fair dealing claims (if not covered in confirmation briefing), witness & exhibit lists, and deposition designations	May 12 <u>July 6</u> , 2023
Confirmation Hearing commences, including trial on implied covenant and DQ claims	May 15 <u>July 11</u> , 2023

~~3719125.1~~3719127.2

Plaintiffs 4.12.23 Amended Serta Confirmation and AP Schedule 3719125v1 and FLL Defs
4.14.23 edits to Plaintiffs 4.12.23 Amended Serta Confirmation and AP Schedule 3719127v2
4/14/2023 10:22:23 AM